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July 27, 2021

VIA ECF

Hon. Madeline Cox Arleo, U.S.D.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building &
U.S. Courthouse
50 Walnut Street, Room MLK 4A
Newark, New Jersey 07102

Re: Ryan Dean v. J. Bissell, et als.
Civil Action No.: 2:21-cv-09770-MCA-ESK

Dear Judge Arleo:

Our firm has been retained to represent Defendants York University and Queens University in connection with the above captioned matter.

We have reviewed the letters filed by Jeffrey Mongiello of Epstein Becker & Green, P.C., counsel for the Canadian Lawyer Defendants (Dkt #11) and Patrick Stoltz of Kaufman Borgeest & Ryan, LLP, counsel for the Insurer Defendants (Dkt #14), regarding alleged service of process in Canada. Queens University and York University face similar issues with the purported service of process, as both received letters containing a non-working Dropbox link to download the Complaint. Such efforts do not constitute proper service of process under the Federal Rules of Civil Procedure and Articles 5 and 10 of the Hague Convention, as set forth in Mr. Mongiello's and Mr. Stoltz's letters.

Given the issues regarding Plaintiff's attempted service and the sheer volume of the 457-page Complaint, we respectfully request that Queens University and York University be granted an extension of time until September 27, 2021, to answer to or otherwise respond to the Complaint.

Hon. Madeline Cox Arleo, U.S.D.J.

July 27, 2021

Page 2 of 2

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Rachel R. Hager

RACHEL R. HAGER

RRH:wjc

cc: All counsel of record (via ECF)